

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MINNESOTA**  
*Criminal No. 21-cr-108 (PAM/TNL) (3)*

---

UNITED STATES OF AMERICA,	)	
	)	
	)	
Plaintiff,	)	<b>MOTION FOR BRADY MATERIAL</b>
Vs.	)	
	)	
J ALEXANDER KUENG,	)	
	)	
Defendant	)	
	)	
	)	

---

The above named defendant by and through his attorney, Thomas C. Plunkett, Esq., moves the Court for an order compelling the Government to immediately, and in no case less than 1 month before trial, disclose all favorable or exculpatory evidence, including:

1. Evidence favorable to the defendant and material to either guilt or to punishment.
2. The existence of witnesses favorable to the defendant.
3. Evidence of identification of persons other than the defendant by eyewitnesses to criminal activity alleges in the Indictment.
4. Evidence of fingerprints, handwriting, or scientific evidence which is not identifies with this defendant.
5. Evidence of items seized from parties not named in the Indictment which tends to identify them, and not the defendant, with the commission of the crime.
6. Evidence which detracts from the credibility or probative value of both testimony and other evidence used by the Government.

7. Evidence of promises made to any witness by the Government related to their testimony and/or cooperation including, but not limited to: monetary payments, tax concessions, immigration treatment, relief from forfeiture, charging decisions, and treatment of family members. Included in this request are the written or oral contracts between the witness and the Government, plea agreements, letters memorializing offers, and notes of conversations between the witness and agents for the Government. Disclosure of the witnesses to be called at trial is also requested, along with any contradictory statements by them.
8. Evidence of misconduct by government witnesses, including false statements, arrests, and convictions.

This motion is based upon *Brady v. Maryland*, 373 U.S. 83 (U.S. 1963) the Indictment, the records and files in the above captioned matter, and any and all matters which may be presented prior to, or at the time of the hearing said motion.

Respectfully submitted,

Dated: August 2, 2021

/s/ Thomas C. Plunkett

Thomas C. Plunkett  
Attorney No. 260162  
Attorney for Defendant  
101 East Fifth Street  
Suite 1500  
St. Paul, MN 55101  
Phone: (651) 222-4357  
Fax: (651) 297-6134  
Email: [tcp@tp4justice.com](mailto:tcp@tp4justice.com)